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7 Attorneys for the United States of America

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA EX REL.	)	CASE NO. 16-CV-314 JSC
12 YUXIN "JAY" FANG,	)	
13 Plaintiff,	)	JOINT STIPULATION OF VOLUNTARY
	)	DISMISSAL; [PROPOSED] ORDER
14 v.	)	
	)	
15 FORTINET INC. and ARROW ENTERPRISE	)	
16 COMPUTING SOLUTIONS INC.,	)	
	)	
17 Defendants.	)	

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28 <sup>1</sup> Civil Chief Sara Winslow is not supervising this case due to a conflict.

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the qui tam provisions of the False Claims Act (FCA), 31 U.S.C. § 3730(b)(1), and in accordance with and subject to all of the terms and conditions of the settlement agreement among the United States, Relator, and Fortinet, Inc., effective April 7, 2019 (the “Settlement Agreement”), the United States and Relator Yuxin “Jay” Fang (“Relator”), hereby stipulate, through their undersigned counsel, as follows:

1. As to the United States, the claims against Defendant are dismissed (a) with prejudice as to the Covered Conduct released in the Settlement Agreement, subject to all of the terms of the Settlement Agreement, and (b) without prejudice as to any other claims.
2. As to Relators, all claims against Defendant are dismissed with prejudice, subject to all of the terms of the Settlement Agreement.
3. A copy of the Settlement Agreement will be provided to the Court upon request.

**IT IS SO STIPULATED**

DATED: April 18, 2019

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s Ellen London<sup>2</sup>  
ELLEN LONDON  
Assistant United States Attorney

DATED: April 18, 2019

SANFORD HEISLER SHARP LLP

s/ Vincent McKnight  
Vincent McKnight  
John McKnight  
Attorneys for Relator

<sup>2</sup> I, Ellen London, hereby attest, in accordance with the Civil L.R. 5(i)(3), the concurrence in the filing of this document has been obtained from the other signatories listed here.

1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Court directs the Clerk to  
3 close this case pursuant to the settlement agreement between the parties.  
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5 **IT IS SO ORDERED.**

6 This \_\_\_\_ day of \_\_\_\_\_, 2019.

7 \_\_\_\_\_  
8 JACQUELINE SCOTT CORLEY  
9 UNITED STATES MAGISTRATE JUDGE  
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